

EXHIBIT 1



Corporate Creations Network Inc.
801 US Highway 1 North Palm Beach, FL 33408

Live Nation Entertainment, Inc.
Kimberly Tobias Senior Vice President Litigation
Live Nation
9348 Civic Center Drive
Beverly Hills CA 90210

April 16, 2024

SERVICE OF PROCESS NOTICE

The following is a courtesy summary of the enclosed document(s). **ALL information should be verified by you.**

Item: 2024-423

Note: Any questions regarding the substance of the matter described below, including the status or how to respond, should be directed to the contact set forth in line 12 below or to the court or government agency where the matter is being heard. **IMPORTANT:** All changes or updates to the SOP contact individuals or their contact information must be submitted in writing to SOPcontact@corpcreations.com. Any changes will become effective upon written confirmation of Corporate Creations.

1.	Entity Served:	Live Nation Entertainment, Inc.
2.	Title of Action:	Erin J. Paxson vs. Live Nation Entertainment, Inc., et al.
3.	Document(s) Served:	Summons Affidavit of Service Complaint
4.	Court/Agency:	Clark County District Court, Nevada
5.	State Served:	Delaware
6.	Case Number:	A-24-890820-C
7.	Case Type:	Breach of Duty
8.	Method of Service:	Hand Delivered
9.	Date Received:	Tuesday 04/16/2024
10.	Date to Client:	Tuesday 04/16/2024
11.	# Days When Answer Due: Answer Due Date:	20 Monday 05/06/2024 CAUTION: Client is solely responsible for verifying the accuracy of the estimated Answer Due Date. To avoid missing a crucial deadline, we recommend immediately confirming in writing with opposing counsel that the date of the service in their records matches the Date Received.
12.	Sop Sender: (Name, City, State, and Phone Number)	The702Firm Las Nevada, NV 702-776-3333
13.	Shipped To Client By:	Email Only with PDF Link
14.	Tracking Number:	
15.	Handled By:	081
16.	Notes:	None.

NOTE: This notice and the information above is provided for general informational purposes only and should not be considered a legal opinion. The client and their legal counsel are solely responsible for reviewing the service of process and verifying the accuracy of all information. At Corporate Creations, we take pride in developing systems that effectively manage risk so our clients feel comfortable with the reliability of our service. We always deliver service of process so our clients avoid the risk of a default judgment. As registered agent, our role is to receive and forward service of process. To decrease risk for our clients, it is not our role to determine the merits of whether service of process is valid and effective. It is the role of legal counsel to assess whether service of process is invalid or defective. Registered agent services are provided by Corporate Creations Network Inc.

SUMMONS

NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ THE INFORMATION BELOW.

TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff against you for the relief set forth in the Complaint.

LIVE NATION ENTERTAINMENT, INC., a Delaware Corporation

1. If you intend to defend this lawsuit, within 20 days after this Summons is served on you, exclusive of the day of service, you must do the following:

a. File with the Clerk of this Court, whose address is shown below, a formal written response to the Complaint in accordance with the rules of the Court, with the appropriate filing fee.

b. Serve a copy of your response upon the attorney whose name and address is shown below.

2. Unless you respond, your default will be entered upon application of the Plaintiff and this Court may enter a judgment against you for the relief demanded in the Complaint, which could result in the taking of money or property or other relief requested in the Complaint.

3. If you intend to seek the advice of an attorney in this matter, you should do so promptly so that your response may be filed on time.

4. The State of Nevada, its political subdivisions, agencies, officers, employees, board members, commission members and legislators, each have 45 days after service of this Summons within which to file an Answer or other responsive pleading to the Complaint.

STEVEN D. GRIERSON

Submitted By:

CLERK OF COURT

By: 

4/10/2024

Name: Joel S. Hengstler, Esq.

Deputy Clerk Klinea Matthews Date

Address: 8335 West Flamingo Road

Regional Justice Center

City/State/Zip: Las Vegas, Nevada 89147

200 Lewis Avenue

Telephone: (702) 776-3333

Las Vegas, Nevada 89155

Attorney for: Plaintiffs

SUMM

MICHAEL C. KANE, ESQ.

Nevada Bar No. 10096

BRADLEY J. MYERS, ESQ.

Nevada Bar No. 8857

JOEL S. HENGSTLER, ESQ.

Nevada Bar No. 11597

THE702FIRM

8335 West Flamingo Road

Las Vegas, Nevada 89147

Telephone: (702) 776-3333

Facsimile: (702) 505-9787

E-Mail: service@the702firm.com*Attorneys for Plaintiffs*CASE NO: A-24-890820-C
Department 29**DISTRICT COURT****CLARK COUNTY, NEVADA**

ERIN J. PAXSON,

*Plaintiff, on behalf of herself and others
similarly situated,*

vs.

LIVE NATION ENTERTAINMENT, INC., a
Delaware Corporation; LIVE NATION
WORLDWIDE, INC., a Delaware
Corporation; LIVE NATION WORLDWIDE
LLC, a Delaware Limited-Liability Company;
C3 PRESENTS, LLC, a Texas Limited-
Liability Company; FRONT GATE
TICKETING SOLUTIONS, LLC, a Texas
Limited-Liability Company, JOHN ROE
COMPANIES NOS. 1-5, ROE BUSINESS
ENTITIES NOS. 1-20; and DOE
INDIVIDUALS NOS. 1-100,

Defendants.

CASE NO.:

DEPT NO.:

SUMMONS

...

...

...

...

1 STATE OF _____)
 2)ss.
 3 COUNTY OF _____)

AFFIDAVIT OF SERVICE

4 _____, being duly sworn, says: That at all times herein
 5 affiant was and is a citizen of the United States, over 18 years of age, not a party to nor interested
 6 in the proceeding in which this affidavit is made. That affiant received _____ copy(ies) of the
 7 Summons and Complaint, _____
 8 on the _____ day of _____, 2024 and served the same on the _____ day of _____,
 9 2024 by:

(Affiant must complete the appropriate paragraph)

1 Delivering and leaving a copy with the Defendant _____
 2 at (state address) _____.

3 2. Serving the Defendant _____ by personally delivering and
 4 leaving a copy with _____, a person of suitable age and discretion
 5 residing at the Defendant's usual place of abode located at: (state address)
 6 _____.

7 3. Serving the Defendant _____ by personally delivering and
 8 leaving a copy at (state address):
 9 _____.

10 (a) With _____ as _____ an
 11 agent lawfully designated by statute to accept service of process;

12 (b) With _____, pursuant to NRS 14.020 as a person of
 13 suitable age and discretion at the above address, which address is the address of
 14 the resident agent as shown on the current certificate of designation filed with the
 15 Secretary of State.

16 4. Personally depositing a copy in a mail box of the United States Post Office, enclosed in a
 17 sealed envelope, postage prepaid (Check appropriate method):

- 18 ☐ Ordinary mail
 19 ☐ Certified mail, return receipt requested
 20 ☐ Registered mail, return receipt requested

21 addressed to the Defendant _____ at Defendant's last known address
 22 which is (state address) _____.

1 COMPLETE ONE OF THE FOLLOWING:

2 (a) If executed in this state, "I declare under penalty of perjury that the foregoing is true and
3 correct."

4 _____
Signature of person making service

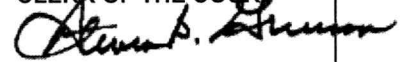
5
6 (b) If executed outside of this state: "I declare under penalty of perjury under the law of the
7 State of Nevada that the foregoing is true and correct."

8 _____
Signature of person making service

9
10 SUBSCRIBED AND SWORN TO before me
11 this ____ day of _____, 2024.

12
13 _____
NOTARY PUBLIC in and for County and State

Electronically Filed
4/9/2024 6:52 PM
Steven D. Grierson
CLERK OF THE COURT


1 COMP

MICHAEL C. KANE, ESQ.

2 Nevada Bar No. 10096

3 BRADLEY J. MYERS, ESQ.

Nevada Bar No. 8857

4 JOEL S. HENGSTLER, ESQ.

Nevada Bar No. 11597

5 THE702FIRM

8335 West Flamingo Road

6 Las Vegas, Nevada 89147

7 Telephone: (702) 776-3333

Facsimile: (702) 505-9787

8 E-Mail: service@the702firm.com

Attorneys for Plaintiffs

CASE NO: A-24-890820-C
Department 29

DISTRICT COURT**CLARK COUNTY, NEVADA**

12 ERIN J. PAXSON,

13 Plaintiff, *on behalf of herself and others*
14 *similarly situated,*

15 vs.

16 LIVE NATION ENTERTAINMENT, INC., a
17 Delaware Corporation; LIVE NATION
18 WORLDWIDE, INC., a Delaware
19 Corporation; LIVE NATION WORLDWIDE
20 LLC, a Delaware Limited-Liability Company;
21 C3 PRESENTS, LLC, a Texas Limited-
22 Liability Company; FRONT GATE
23 TICKETING SOLUTIONS, LLC, a Texas
24 Limited-Liability Company, JOHN ROE
25 COMPANIES NOS. 1-5, ROE BUSINESS
26 ENTITIES NOS. 1-20; and DOE
27 INDIVIDUALS NOS. 1-100,

28 Defendants.

CASE NO.:

DEPT NO.:

COMPLAINT**EXEMPT FROM ARBITRATION:****Exemption Claimed: Class Action****CLASS ACTION CLAIM INCLUDED**

COMPLAINT

COME NOW, Plaintiffs, by and through their counsel of record, MICHAEL C. KANE ESQ., BRADLEY J. MYERS, ESQ., and JOEL S. HENGSTLER, ESQ., of THE702FIRM, and for their complaint allege as follows:

JURISDICTIONAL STATEMENT

1. The Eighth Judicial District Court has jurisdiction of this civil tort action in accordance with NRCP 8(a)(4), NRS 13.040 and NRS 41.130 as the occurrence giving rise to this matter occurred in Clark County, Nevada and the amount in controversy exceeds \$15,000.

PARTIES

2. Plaintiff ERIN J. PAXSON ("Plaintiff") is a resident and citizen of Ohio who purchased a ticket to attend the 2022 Lovers and Friends in Las Vegas, Nevada.

3. The unnamed class members ("Plaintiffs") are, upon research and belief, primarily citizens California and Nevada.

4. LIVE NATION ENTERTAINMENT, INC. and LIVE NATION WORLDWIDE, INC. and LIVE NATION WORLDWIDE, LLC (collectively, "Live Nation") are Delaware corporations or limited liability companies with their principal places of business in California.

5. C3 PRESENTS, LLC ("C3" or the "Promoter") is the Texas company responsible for selling tickets to the festival. Upon belief, Live Nation Entertainment, Inc. has owned a controlling stake in C3 Presents for over a decade.

6. FRONT GATE TICKETING SOLUTIONS, LLC ("Front Gate" or the "Ticket Seller") is Texas company responsible for selling tickets to the festival. Upon reference, Front Gate is or was a division of C3. It is also completely dominated by Live Nation, depriving it of its separate corporate existence

7. Defendant JOHN ROE Companies Nos. 1-5 are any companies described as the "Event Organizer" in Live Nation's Purchase Policy. In the alternative, C3 is the "Event Organizer."

...

...

10. The true names and capacities of Defendants named herein as ROE BUSINESS ENTITIES Nos. 1-20 and DOE INDIVIDUALS Nos. 1-100, whether individual, corporate, associate, or otherwise, are presently unknown to Plaintiffs, who, therefore, sues said defendants so designated herein is responsible in some manner for the events and occurrences referred to herein alleged, and Plaintiffs will request leave of Court to amend this Complaint to insert the true names and capacities of ROE BUSINESS ENTITIES Nos. 1-20 and DOE INDIVIDUALS Nos. 1-100, when the same have been ascertained and to join such defendants in this action. That specifically ROE BUSINESS ENTITIES Nos. 1-20 and DOE INDIVIDUALS Nos. 1-100 may be principles in the promotion, production, organization, facilitation, and/or security of the subject 2022 Lovers and Friends Festival and/or were responsible for the advertisement, promotion and/or sale of tickets thereto.

25 || **BACKGROUND**

THE702FIRM
INJURY ATTORNEYS
8335 W. Flamingo Rd.
Las Vegas, Nevada 89147
Phone: (702) 776-3333

1 13. Defendants organized and promoted the “Lovers and Friends” music festival, held
2 over the weekend of May 14–15, 2022.

3 14. The event was interrupted when, on the evening of May 14, 2022, Defendants
4 publicly announced on the concert screens that a “security incident” was occurring and, through
5 their employees, falsely disseminated to the crowd that there was a live shooter.

6 15. This caused panic to set into the crowd, causing a stampede for the exits. Many
7 victims were knocked to the ground, and they tried to cover themselves as they lay on the ground
8 hoping not to be trampled by a sea of people. Others hid behind trash cans or in the bathroom
9 stalls, trying to avoid injury or death.

10 16. If any event could have been eligible for a refund under Defendants’ purchase
11 policy, it would have been Lovers and Friends 2022.

12 17. In fact, Defendants’ “Purchase Policy” indicates that some events will be “eligible
13 for refunds,” and that the Event Organizer “may provide the option to request a credit for
14 canceled, postponed, rescheduled, or moved events.”

15 18. The amount of the credit “will always include at least 100% of the price of the
16 original ticket(s), plus fees and taxes.”

17 19. While the contract suggests that Defendants had some degree of discretion as to
18 whether to issue refunds or credits, Defendants had a duty of good faith and fair dealing not to
19 abuse that discretion.

20 20. Defendants abused that discretion by not offering any refund or credit to
21 Plaintiffs.

22 21. Not only did Defendants falsely disseminate to the crowd that a security incident
23 was ongoing—which should have been near automatic grounds for postponing the remainder of
24 the event and giving a refund, especially given that there was a stampede causing injuries—but
25 they also failed to deliver on most of their other promises regarding the event.

26 22. For instance, Defendants heavily advertised the event as having particular artists
27 in its lineup.

28 ...

23. Yet Defendants placed artists on strict time limits—and if an act went over time, Defendants cut the mics, sometimes mid-song. Artists such as Juvenile, The-Dream, and Ma\$e all had their mics turned off during their performances.

24. What is more, Defendants failed to provide the artists with appropriate sound equipment for the hot weather that day, however, resulting in several artists having major technical issues.

25. Upon reference, about half of all sets were cut off while the artist was still performing.

26. Defendants also advertised the festival as beginning at 10:00 A.M. on May 14, 2022, but upon reference, they delayed opening the gates until a full hour later.

27. Finally, Defendants advertised the festival as having water stations available to guests to help them refresh themselves from the heat, and guests with “GA+” level tickets were entitled to receive free water.

28. However, Defendants did not provide concertgoers with anything other than hot water, which was essentially undrinkable due to the heat. Ice cubes were then available for purchase at exorbitant rates.

29. Defendants have, to date, failed to do anything to make concertgoers whole.

30. This action follows.

CLAIM 1: BREACH OF THE DUTY OF GOOD FAITH AND FAIR DEALING

31. Plaintiffs’ claims below are, in the context of a class action, for more than \$15,000.

32. Every contract contains within it a duty of good faith and fair dealing.

33. Defendants, through their Purchase Policy, had a duty of good faith and fair dealing not to act arbitrarily in deciding whether to issue refunds or credits for events.

34. Defendants breached that duty when they failed to offer refunds or credits after falsely telling the crowd at the 2022 Lovers and Friends festival that there was a security incident, leading to mass panic.

...

3

6

7

9

10

12

14

15

19

21

22

23

- 26

27

28

4. Awarding the Class general, special, and compensatory damages;
5. Awarding Plaintiffs' counsel a reasonable fee and costs of suit incurred; and
6. Any other relief the Court deems just and proper.

DATED this 9th day of April, 2024.

THE702FIRM

/s/ Joel S. Hengstler
MICHAEL C. KANE, ESQ.
Nevada Bar No. 10096
BRADLEY J. MYERS, ESQ.
Nevada Bar No. 8857
JOEL S. HENGSTLER, ESQ.
Nevada Bar No. 11597
8335 West Flamingo Road
Las Vegas, Nevada 89147
Attorneys for Plaintiffs